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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

IN RE:	§	CHAPTER 13
Thomas Henry Zehren	§	CASE NO. 17-10108-jdl-13
AND	§	
Janna Marie Zehren	§	
DEBTORS	§	
	§	

MOTION TO MODIFY TERM OF CHAPTER 13 PLAN AFTER CONFIRMATION
UNDER 11 USC §1329 APPLICATION FOR COMPENSATION AND
NOTICE OF OPPORTUNITY FOR HEARING

DEBTORS Thomas Henry Zehren and Janna Marie Zehren, by and through attorney, Monte J. White, file this Motion to Modify Term of Chapter 13 Plan after Confirmation, and respectfully request to modify their plan as follows:

1. Debtor's Chapter Plan was confirmed on 3/28/2017.
2. That Debtor's confirmed plan required plan payments of \$1,001.00 for 60 months months for a total plan base of \$52,508.50.
3. In November 2018, Creditor Tinker Federal Credit Union was granted a relief of Stay and Debtors' 2008 Ram Truck was repossessed.
4. The Trustee shall cease making payments to Tinker Federal Credit Union.
5. Debtors shall be treated as current through February 2019 and request that their plan payment be adjusted to \$650.00 beginning March 2019, and the plan base shall adjust accordingly.
6. Debtors' attorney shall be allowed compensation of \$500.00 to be paid through the plan.

NOTICE OF OPPORTUNITY FOR HEARING

Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the Court to sustain the motion, or you wish to have your views considered, you must file a written response to the motion with the Clerk of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City, OK 73102 no later than 21 days from the date of filing of the motion. You should also serve a file-stamped copy of the response to the undersigned [and others who are required to be served] and file a certificate of service with the court. If no response is timely filed, the court may sustain the objection and strike the scheduled hearing without further notice.

Respectfully submitted,
/s/Monte J. White
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Wichita Falls, TX 76301
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(940) 723-0096 fax
Attorney for Debtors,
Thomas Henry Zehren
Janna Marie Zehren

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on 2/12/2019, a true and correct copy of the attached was served on the following parties in interest by ECF:

CHAPTER 13 TRUSTEE

John Hardeman

OKLAHOMA TAX COMMISSION

US TRUSTEE

INTERNAL REVENUE SERVICE

The undersigned hereby certifies that on 2/12/2019, a true and correct copy of the attached was served on the following parties in interest by First Class Mail:

Account Mgmt Resources
PO Box 60607
Oklahoma City, OK 73146

Capital One
PO Box 30285
Salt Lake City, UT 84130

FBCS
330 S Warminster Rd Ste 353
Hatboro, PA 19040

AFNI, Inc
1310 Martin Luther King Dr
PO Box 3517
Bloomington, IL 61702-3517

CBCS
PO Box 1022
Wixom, MI 48393

Franklin Collection
Service, Inc
PO Box 3910
Tupelo, MS 38801

Arvest Bank
2902 E. Gore
Lawton, OK 73505

Chase Card
Attn: Correspondence
PO Box 15298
Wilmington, DE 19850

Kansas Counselors, Inc
PO Box 14765
Shawnee Mission, KS 66285

Bank Of America
NC4-105-03-14
PO Box 26012
Greensboro, NC 27410

Discover Financial
PO Box 3025
New Albany, OH 43054

Medical Data Systems (MDS)
2001 9th Ave
Ste 312
Vero Beach, FL 32960

Capital Accounts
PO Box 140065
Nashville, TN 37214

ERC/Enhanced
Recovery Corp
8014 Bayberry Rd
Jacksonville, FL 32256

Midland Funding
2365 Northside Dr
Suite 300
San Diego, CA 92108

Natiowide Recovery Service
PO Box 8005
Cleveland, TN 37320

Shapiro & Cejda LLC
770 NE 63rd St
Oklahoma City, OK 73105

Wells Fargp Home Mortgage
Written Correspondence
Resolutions
MAC#2302-04E- POB 10335
Des Moines, IA 50306

NCB Managment Services, Inc
PO Box 1099
Langhorne, PA 19047

Tinker Fcu
PO Box 45750
Tinker AFB, OK 73145

Works & Lentz, Inc.
3030 NW Expressway Street
Suite 1300
Oklahoma City, OK 73112

Plain Green Loans
93 Mack Rd Ste 600
PO Box 270
Box Elder, MT 59521

Usaa Federal Savings Bank
10750 McDermott Freeway
San Antonio, TX 78288

Portfolio Recovery
PO box 41067
Norfolk, VA 23541

Respectfully submitted,

/s/Monte J. White
Attorney for Debtors